

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

DECLARATION OF SETH A. GOLDBERG

I, Seth A. Goldberg, of full age, hereby declare as follows:

1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, a Partner with the law firm of Duane Morris LLP, and counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Solco Healthcare U.S. (“Solco”), and Huahai U.S. Inc. (“Huahai U.S.”, and collectively with ZHP, Princeton, and Solco, “the ZHP Parties”).

2. I make this Declaration based on personal knowledge and in support of the ZHP Parties’ Cross Motion for Protective Order to Preclude the Production of the Custodial File of Baohua Chen.

3. A true and correct copy of the final transcript of Jucai Ge’s deposition testimony on April 30, 2021 is attached to this Declaration as **Exhibit A**.

4. A true and correct copy of the final transcript of Lihong (Linda) Lin’s deposition testimony on May 4, 2021 is attached to this Declaration as **Exhibit B**.

5. A true and correct copy of the final transcript of Min Li's deposition testimony on April 22, 2021 is attached to this Declaration as **Exhibit C**.

6. A true and correct copy of the final transcript of Eric Gu's deposition testimony on April 5, 2021 is attached to this Declaration as **Exhibit D**.

7. A true and correct copy of the final transcript of Hai Wang's deposition testimony on March 11, 2021 is attached to this Declaration as **Exhibit E**.

8. A true and correct copy of the final transcript of John Iozzia's deposition testimony on January 20, 2021 is attached to this Declaration as **Exhibit F**.

9. Attached to this Declaration as **Exhibit G** is a table listing the titles held by Baohua Chen in various public bodies.

10. Attached to this Declaration as **Exhibit H** is an index cataloging the volumes of the ZHP Parties' productions to date in this litigation.

11. Attached to this Declaration as **Exhibit I** is a list of the custodial files collected in connection with the ZHP Parties' productions in this litigation.

12. Attached to this Declaration as **Exhibit J** is a table illustrating the references to Baohua Chen in the exhibits introduced at the depositions of the ZHP Parties witnesses.

13. A true and correct copy of an English language translation of an e-mail dated July 27, 2017, authored by ZHP employee Jinsheng Lin (ZHP00190573) is attached to this Declaration as **Exhibit K**.

14. A true and correct copy of an e-mail dated April 23, 2021 from Plaintiffs' counsel to counsel for the ZHP Parties is attached to this Declaration as **Exhibit L**.

15. A true and correct copy of a declaration executed by Linhong (Linda) Lin, the Director of Regulatory Affairs of ZHP, is attached to this Declaration as **Exhibit M**.

16. A true and correct copy of a declaration executed by Yang Xueyu, a partner of Yu Zheng Law Firm, is attached to this Declaration as **Exhibit N**.

17. Attached to this Declaration as **Exhibit O** is a table comparing the volume of correspondence including Baohua Chen to the total production volume of the ZHP Parties to date in this litigation.

Executed on May 14, 2021.

Respectfully submitted,

/s/ Seth A. Goldberg
Seth A. Goldberg, Esq.
Lead Counsel and Liaison
Counsel for Defendants

DUANE MORRIS LLP

Seth A. Goldberg, *Lead Counsel and*
Liaison Counsel for Defendants
30 South 17th Street
Philadelphia, Pennsylvania 19103
Tel.: (215) 979-1000
Fax: (215) 979-1020
SAGoldberg@duanemorris.com

Attorneys for Zhejiang Huahai
Pharmaceutical Co, Ltd., Princeton
Pharmaceutical Inc., and Solco
Healthcare US, LLC